

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

MUTAZ M. ABUSHAWISH, and
MHAMMAD A. ABU-SHAWISH

Plaintiffs,

Case No.: 20-CV-1914

v.

MILWAUKEE COUNTY,
DANIEL O. HUMPHREYS,
MICHAEL GALEZEWSKI, and
EARNELL LUCAS

Defendants.

**PLAINTIFFS', MUTAZ ABUSHAWISH's AND MHAMMAD ABU-SHAWISH's,
MOTION FOR SUMMARY JUDGMENT AGAINST DEFENDANTS DANIEL
HUMPHREYS and MICHAEL GALEZEWSKI**

NOW COME the plaintiffs, Mutaz Abushawish and Mhammad Abu-Shawish, and by and through their attorneys, Martin Law Office, S.C., and respectfully move this court, the Hon. Lynn Adelman presiding, for an order granting partial summary judgment pursuant to Fed. R. R. Civ. P. 56 and Civil L.R. 56. Specifically, the plaintiffs move for an order granting partial summary judgment as to the following claims:

- (1) Against Daniel Humphreys as to Mutaz Abushawish's claim, pursuant to 42 U.S.C. § 1983, that Daniel Humphreys arrested Mutaz Abushawish unlawfully without probable cause in violation of Mutaz Abushawish's Fourth Amendment Rights, as alleged in the plaintiff's first cause of action.
- (2) Against Daniel Humphreys as to Mutaz Abushawish's claim, pursuant to 42 U.S.C. § 1983, that Daniel Humphreys unlawfully seized Mutaz Abushawish's personal effects in violation of Mutaz Abushawish's Fourth Amendment Rights, as alleged in the plaintiff's first cause of action.

- (3) Against Daniel Humphreys as to Mhammad Abu-Shawish's claim, pursuant to 42 U.S.C. § 1983, that Daniel Humphreys unlawfully seized Mhammad Abu-Shawish's personal effects in violation of Mutaz Abushawish's Fourth Amendment Rights, as alleged in the plaintiff's first cause of action.
- (4) Against Michael Galezewski as to Mutaz Abushawish's claim, pursuant to 42 U.S.C. § 1983, that Michael Galezewski unlawfully arrested Mutaz Abushawish without probable cause in violation of Mutaz Abushawish's Fourth Amendment Rights, as alleged in the plaintiff's first cause of action.
- (5) Against Michael Galezewski as to Mhammad Abu-Shawish's claim, pursuant to 42 U.S.C. § 1983, that Michael Galezewski unlawfully seized Mhammad Abu-Shawish's personal effects in violation of Mutaz Abushawish's Fourth Amendment Rights, as alleged in the plaintiff's first cause of action.

The Grounds for this motion for partial summary judgment are stated in the plaintiff's Memorandum in Support of Plaintiff's Motion for Summary Judgment against Defendants Daniel Humphreys and Michael Galezewski. The motion is further supported by the pleadings, the Plaintiff's Proposed Findings of Fact and the Declaration, including exhibits, of Drew J. DeVinney.

Dated: December 13, 2021

MARTIN LAW OFFICE, S.C.
Attorney for Plaintiff(s)

Electronically Signed by Drew J. DeVinney

Drew J. De Vinney
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